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August 17, 2006

Mr. Frederick L. Rudolph
Alabama Department of Environmental Management
1400 Coliseum Boulevard
Montgomery, AL 36110-2059

Mr. Tom Lederly
2530 Crystal Drive
Room 5000 Taylor Building/NC3
Arlington, VA 22202

Subject: Cleanup Agreement No. A14 210 020 562
Transmittal of Final Engineering Evaluation and Cost Analysis (EE/CA) Action
Memorandum Bravo Munitions Response Site MRS-1 and Industrial Access Road,
McClellan, Anniston, Alabama

Dear Messrs. Rudolph and Lederly:

This letter is sent to forward copies of the Final Engineering Evaluation and Cost Analysis (EE/CA) Action Memorandum Bravo Munitions Response Site -1 and Industrial Access Road, McClellan, Anniston, Alabama on behalf of the Anniston Calhoun County Fort McClellan Development Joint Powers Authority. Our response to one Army comment on the Draft Final version is attached. Please contact me at 404.414.7054 if you have any questions on this submittal.

Sincerely,

MATRIX ENVIRONMENTAL SERVICES, LLC.

Richard L. Satkin, P.G.
Senior Project Manager

c: Miki Schneider – JPA
Lisa Holstein – Army TF
Jim Pastorick – UXOPro
Steve Young – MES

Transition Force Comment

COMMENT 1. Funding for a clearance and land use controls in the MRS-1 area is not provided in the ESCA. Rationale: The Action Memorandum stated that MRS-1 is 108 acres and that 58.3 acres will be cleared to depth and 49.4 acres will be cleared to one foot depth (total is 107.7 Ac). It appears there is no funding in the current ESCA for MEC clearance and construction support. There was funding for surface clearance of 8.5 acres along the south side of Bains Gap Road..

RESPONSE 1. As a result of a shift in priorities, an amendment to the ESCA (Modification No. P00003) was signed on June 29, 2006 that added MRS-1 to the Area Covered by Environmental Services and to allow existing funds to complete this work.

ADEM

ALABAMA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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July 21, 2006

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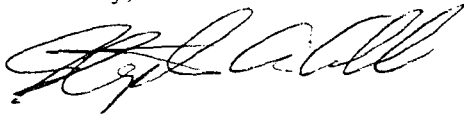
RE: ADEM Concurrence: *Draft Final Engineering Evaluation and Cost Analysis (EE/CA)*
Action Memorandum Bravo Munitions Response Site MRS-1 and Industrial Access Road,
dated June 2006
McClellan, Alabama
Facility ID No. AL4 210 020 562

Dear Mr. Cleckler:

The Alabama Department of Environmental Management (ADEM or the Department) has reviewed the subject Action Memorandum pertaining to Bravo Munitions Response Site MRS-1 and Industrial Access Road. The subject Action Memorandum details site-specific work activities as required in the *Final Program-Level Work Plan Munitions and Explosives of Concern Remediation Alpha and Bravo Munitions Response Areas of McClellan*, dated April 2006. The Department concurs with the subject Action Memorandum.

Should you have any questions, contact Mr. Frederick Rudolph of the Governmental Hazardous Waste Branch at (334) 270-5646 or via e-mail at frudolph@adem.state.al.us.

Sincerely,



Stephen A. Cobb, Chief
Governmental Hazardous Waste Branch
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SAC/TPS/FLR/mal

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**Final
Engineering Evaluation and Cost Analysis (EE/CA)
Action Memorandum
Bravo Munitions Response Site-1 and Industrial Access Road
McClellan
Anniston, Alabama**

Prepared for:

**Anniston Calhoun County Fort McClellan Development Joint Powers Authority,
McClellan, Anniston, Alabama**



Prepared by:



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August 2006

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FOREWORD

This Engineering Evaluation and Cost Analysis (EE/CA) Action Memorandum document presents the selected munitions and explosives of concern (MEC) response actions for former Fort McClellan located in Calhoun County, Alabama. The Anniston – Calhoun County Fort McClellan Development Joint Powers Authority (JPA) is the lead agency and has developed this EE/CA Action Memorandum in accordance with the Comprehensive Environmental Response, Compensation, and Liability Act as amended; and is consistent with the National Contingency Plan. The selection of MEC response actions is based on the information contained in the administrative record for this site. This document has been approved by the undersigned.



Dan Cleckler, Executive Director
Anniston – Calhoun County Fort McClellan Development
Joint Powers Authority

1.0 INTRODUCTION

The purpose of this Action Memorandum is to document the Anniston – Calhoun County Fort McClellan Development Joint Powers Authority's (JPA) decision regarding the selected risk – reduction alternatives to address munitions and explosives of concern (MEC) in the Bravo Area at McClellan, Alabama. This Action Memorandum addresses a final response action south of Bains Gap Road and thereby supersedes the Final EE/CA Action Memorandum Bravo Area Munitions and Explosives of Concern McClellan, Anniston, Alabama dated December 2005. In addition, this Action Memorandum addresses the remedy for the area known as the Proposed Industrial Access Road. The response actions described in this Action Memorandum are based on the Draft Engineering Evaluation/Cost Analysis Bravo Area of the Redevelopment Area Fort McClellan, Alabama (Tetra Tech, FW Inc., December 2004) (Army EE/CA). These removal actions are being proposed in advance of the final Army EE/CA in order to avoid delays in redevelopment. As the primary decision document, the Action Memorandum becomes a critical component of the Administrative Record, required by Section 113(k) of the Comprehensive Environmental Response Compensation and Liability Act (CERCLA).

McClellan, formerly known as Fort McClellan, is an 18,929-acre site located in Calhoun County, Alabama and was used by the Department of the Army for ordnance and chemical weapons training and other military exercises. In September 1999, McClellan was closed under Base Realignment and Closure (BRAC) as recommended by the 1995 Defense Base Closure and Realignment Commission in conformance with Public Law 101-510 as amended, the Defense Base Closure and Realignment Act.

Under CERCLA Section 9620(h)(3)(C), Federal property may be transferred prior to the completion of all remedial action necessary to protect human health and the environment. Acting in accordance with this early transfer authority, portions of McClellan were transferred in September 2003 to the local reuse authority (JPA), which assumed responsibility for certain environmental and munitions response activities. The Environmental Services Cooperative Agreement (ESCA) No. DASW01-03-2-0001 between the Department of the Army (Army) and JPA, and Cleanup Agreement No. AL4 210 020 562 between JPA and Alabama Department of Environmental Management (ADEM) memorializes the early transfer agreements and responsibility for environmental cleanups. These documents require that the JPA conduct munitions response actions in select areas of McClellan (i.e., Alpha Area and Bravo Area) in accordance with a Department of Defense Explosive Safety Board (DDESB) – approved Explosive Safety Submission (ESS). The JPA subsequently must obtain approval from ADEM that the required munitions response actions are complete.

There are three munitions response areas at McClellan (Figure 1). These sites have been grouped for geographical, explosive hazards and future reuse purposes into the Alpha, Bravo, and Charlie Areas. The Bob Stump National Defense Authorization Act for Fiscal Year 2003 authorized the transfer of 7,759 acres from the Army to the Department of Interior to establish the Mountain Longleaf National Wildlife Refuge in the Charlie Area. On October 23, 2003, the JPA transferred an additional 1,257 acres to the Department of Interior to increase the Charlie refuge acreage to 9,016 acres. The Army has retained responsibility for the munitions response actions required in the Charlie Area.

The Alpha Area was transferred by the Army to the JPA in September 2003 with the responsibility for completing any required munitions response actions. A Final Action Memorandum addressing munitions response in portions of the Alpha Area has been previously submitted and approved by ADEM.

The Bravo Area was transferred to the JPA in September 2003. In September 2005, the transfer of responsibility for munitions response actions for select areas in Bravo was also transferred to the JPA via an amendment to the ESCA. Those areas include the Industrial Access Road and its right-of-way, 38 acres in Planning Area 4 (Range 18), and Bains Gap Road. Currently, the Army and JPA are finalizing negotiation of the transfer of responsibility for the munitions response actions in the remainder of Bravo Area.

As a result of new redevelopment opportunities and changed land use, the JPA has designated new boundaries for MEC clearance in the Bravo area. The area has been divided into a total of 11 munitions response sites (Figure 2). These sites take into account the type of MEC found during the EE/CA, current JPA land use, and redevelopment implementation and explosive safety considerations.

Munitions Response Site-1 (MRS-1) and the Proposed Industrial Access Road MRS is the subject of this Action Memorandum.

2.0 BACKGROUND

McClellan has documented its use as a military training area since 1912, when the Alabama National Guard used it for artillery training. However, the Choccolocco Mountains may have been used for artillery training as early as 1898 by the units stationed at Camp Shipp in the Blue Mountain Area during the Spanish American War. The 29th Infantry Division used areas of McClellan for training before being ordered to France during World War I. In 1917, Congress authorized the establishment of Camp McClellan. In 1929, the camp was officially designated as Fort McClellan. Before World War II, the 27th Infantry Division assembled at McClellan for training. During the war, many other units used the site for various training purposes. McClellan was put into inactive status in June 1947 following World War II, and was reactivated in January 1950. The site was used for National Guard training and was selected as the site for the Army's Chemical Corps School. McClellan was closed in September 1999.

Bains Gap Road provides access to residents between the Choccolocco Valley and community of White Plains and the Towns of Anniston and Jacksonville. Since the early 1900's, Bains Gap Road was open to the public at the discretion of the fort commander. Immediately prior to the closure of McClellan in 1999, the Army kept the road open to the public during daylight hours. As part of the closure process, the Army initiated studies to characterize potential environmental contamination and the presence of UXO. These studies, along with the safety hazards from UXO, further impeded the opening of Bains Gap Road to the public. Bains Gap Road has been closed to the public since the effective closure of the installation in 1999.

Approximately 2.4 miles of Bains Gap Road are located in the Charlie Area. Sections of the Charlie Area including Bains Gap Road east of the mountain were identified by the Army as free of potential MEC and opened to the public in December 2003. The portion of Bains Gap Road west of the gap, however has remained closed in accordance with Army land use controls. The Army has completed a clearance along a 200-foot wide zone, 100 feet either side of the centerline of Bains Gap Road and road upgrades are currently underway.

The portion of Bains Gap Road controlled by the JPA is approximately 3,640 feet in length. The road begins at the intersection of Iron Mountain Road and forms a border between the Alpha and Bravo Areas. A lock and gate at the intersection of Iron Mountain Road and Bains Gap Road restricts public access onto the road. Warning signs stationed approximately every 100 feet are located along both sides of the road.

MRS-1 is approximately 108 acres in size and is located along the northeastern Bravo boundary. MRS-1 includes the JPA's portion of Bains Gap Road and extends 1395 feet south of the road. It also extends approximately 20 feet north to the Bravo Boundary along the west end of Bains Gap Road. The width of the MRS (1395 feet) was arrived at based on the exclusion zone or minimum separation distance for the munitions with the greatest fragmentation distance (MGFD) that is implemented for non-project personnel during MEC removal operations. The MGFD for MRS-1 is 1395 feet and is based on an 81 mm HE mortar that was recovered during the Army's Bravo EE/CA.

MRS-1 includes portions of the Army EE/CA sector M4-1H Mixed Use Area-PR. The northern portion of Water Tank Construction Site C is located within MRS-1 and a Clearance to Depth was completed by the Army at this site to prevent conflicts or delays with the construction of a water tower. During the Army's Bravo EE/CA (Tetra Tech, FW Inc., December 2004) 33 UXO items were identified on the surface, at shallow depths, and at a maximum depth of 21 inches. Recovered UXO items ranged in size from a Practice Hand Grenade with a live fuze up to an 81mm HE Mortar.

The proposed Industrial Access Road MRS follows the same footprint as Iron Mountain Road in the Bravo Area. A lock and gate immediately south of the Bains Gap Road intersection restricts public access onto this road. This MRS is approximately 55 acres and consists of a 250-foot swath centered on the road.

The proposed Industrial Access Road MRS follows the boundary along portions of the Army EE/CA sectors M4-1H Mixed Use Area-PR, A1 Reconnaissance Area-D, M3-1L Suspect Area 1-PR, and M3-1L Mixed Projectile Area-PR. During the Army's Bravo EE/CA 9 UXO were recovered in A1 Reconnaissance Area-D, 14 UXO were recovered in M3-1L Suspect Area 1-PR and 1 UXO was recovered in M3-1L Mixed Projectile Area-PR. UXO were recovered on the surface to a maximum depth of 15 inches. UXO items ranged in size from a 37mm HE Projectile to a 155 Shrapnel Projectile.

3.0 STATEMENT OF BASIS AND PURPOSE

Prospective beneficial uses of the Bravo Area have been identified and prioritized for reuse under the BRAC process. The purpose of this EE/CA Action Memorandum is to present the selected munitions response actions for those areas prioritized for early redevelopment within the Bravo Area. The permanent opening of Bains Gap Road has become a priority in advance of the redevelopment of this area. This Action Memorandum will be amended in the future as modified land uses are identified and phased in. The land uses may be modified based on development absorption rates, marketing and other economic drivers.

Based on the results of the Army draft Bravo EE/CA Report (Tetra Tech, FW Inc., December 2004), which included a qualitative baseline risk evaluation and comparative analysis of potential munitions response actions, the most appropriate alternative was selected. Potential land uses in the Bravo Area that were considered in the Army EE/CA included development, mixed business use, cultural, retail, active recreation, and passive recreation. The land use considered by the Army for the area encompassing MRS-1 was passive recreation. Recommendations for MEC clearance in this Action Memorandum take into account the JPA's current land use redevelopment plan, the degree of public usage and the types of items found during the site characterization.

The JPA currently plans to develop the MRS-1 area into a mixed use development (58.3 acres) with nearly half of the area (49.4 acres) designated as McClellan Park System. A Clearance to Depth will be conducted in the mixed use development portion and a Clearance to 1 Foot will be conducted in the area designated as McClellan Park System. On the west end of Bains Gap Road, the Clearance to Depth will extend 20 feet north of the road to the Bravo boundary. A Clearance to Depth will also be performed in the Industrial Access Road MRS. The footprint of both existing asphalt roads, approximately 20 feet wide, will be geophysically surveyed but no removal will occur there because the asphalt road will remain intact. A deed restriction will also be placed that requires the use of UXO construction support/anomaly avoidance for future excavations in the roadway. These actions are protective for redevelopment of the property and the permanent opening of Bains Gap Road and take into account the degree of public usage and types and depth of MEC items previously found in the area.

The process for munitions response action selection is documented in the Administrative Record for the site. The project Administrative Record, which includes the Archives Search Report and other pertinent project documents, is maintained at two locations. The records are available for public access at:

Anniston Calhoun County Public Library
Reference Section
108 East 10th Street
Anniston, Alabama 36201
Point of Contact: Ms. Sunny Addison
Telephone: (256) 237-8501

Houston Cole Library
9th Floor
Jacksonville State University
700 Pelham Road, North
Jacksonville, Alabama 36265
Point of Contact: Ms. Paula Ellis-Barnett
Telephone: (256) 782-5249

4.0 PROJECT JUSTIFICATION

A variety of material potentially presenting an explosive hazard (MPPEH) was recovered during the Army's EE/CA field investigations conducted at McClellan. The permanent opening of Bains Gap Road is a community priority as it serves as an evacuation route and provides access to residents between the towns located east and west of the Choccolocco Mountains. This, combined with the redevelopment plans for the property and presence of MEC items, is justification for a final removal action at this site.

The data collected during the Army EE/CA field investigation was used to perform a qualitative risk evaluation for assessing the MEC risk to public safety and the environment. The qualitative risk analysis was completed based on the U.S. Army Corps of Engineers, Engineering and Support Center Huntsville (USAESCH) Ordnance and Explosives Risk Impact Assessment (OERIA) evaluation tool. This tool qualitatively evaluates three primary risk factors: 1) presence of OE, 2) site characteristics, and 3) human factors. A detailed discussion of the OERIA is presented in the Army EE/CA (Tetra Tech FW, Inc., December 2004).

5.0 ALTERNATIVES CONSIDERED

Six non-time critical MEC response action alternatives were developed and evaluated in the Bravo Area where a public safety risk associated with MEC was identified. The response action alternatives are described in Table 1.

Table 1 – Munitions Response Action Alternatives

Alternative	Description
Alternative 1 – No Further Action	The No Further Action alternative involves no additional action at the site. This alternative does not impose any land use controls (i.e., as described below for Alternative 2). An Explosives Safety Submission would be submitted to DDESB for approval.
Alternative 2 – Land Use Controls	No clearance action will be conducted. Site-specific land use controls may consist of one or more institutional or engineering controls tailored to an area. Institutional controls considered included: a community education program; a deed notice filed with the property transfer documents that informs future owners of the military history of the site and provides notification procedures in the event a MEC item is discovered, and a deed restriction that prohibits digging in the area without construction support by UXO-qualified personnel. Engineering controls considered included: fences, gates, signage, and security patrols. An Explosives Safety Submission would be submitted to DDESB for approval. Recurring reviews would be conducted on 5 year intervals for a period of 20 years to ensure the selected response alternative remains appropriate.

Alternative 3 – Construction Support	This alternative includes providing clearance of MEC items in designated areas where intrusive building activities are planned. An Explosives Safety Submission would be submitted to DDESB for approval. Recurring reviews would be conducted on 5 year intervals for a period of 20 years to ensure the selected response alternative remains appropriate.
Alternative 4 – Surface Clearance	This alternative involves removal of surface MEC items from the site. This alternative includes a deed restriction that prohibits digging in the area without construction support by UXO-qualified personnel. An Explosives Safety Submission would be submitted to DDESB for approval. Recurring reviews would be conducted on 5 year intervals for a period of 20 years to ensure the selected response alternative remains appropriate.
Alternative 5 – Clearance to 1 Foot	This alternative involves removal of MEC items on the surface to a depth of 1 foot. This alternative includes a deed restriction that prohibits digging in the area without construction support by UXO-qualified personnel. An Explosives Safety Submission would be submitted to DDESB for approval. Recurring reviews would be conducted on 5 year intervals for a period of 20 years to ensure the selected response alternative remains appropriate.
Alternative 6 – Clearance to Depth	This alternative involves continued investigation (i.e., excavation) of a suspect anomaly until the source of the anomaly is found and removed. The clearance depth is not limited. An Explosives Safety Submission would be submitted to DDESB for approval.

6.0 HIGHLIGHTS OF COMMUNITY PARTICIPATION

The JPA conducts open monthly meetings to discuss issues pertinent to the redevelopment of McClellan. The JPA is working closely with the Army, ADEM, Department of Interior, Calhoun County and the City of Anniston to open Bains Gap Road. A public meeting has not yet been held by the Army to present the conclusions and recommendations of the EE/CA as it is still under development.

7.0 COORDINATION SUMMARY

Clearance activities in the southern portion of the Alpha Area by the JPA and road upgrades that will be performed along portions of Bains Gap Road in the Charlie Area by Calhoun County will be coordinated with this action to prevent delays or conflicts. Project activities for the Bravo EE/CA were coordinated with USAESCH, ADEM, and JPA through the BRAC Cleanup Team (BCT).

The work plan and draft Army EE/CA Report were reviewed by USAESCH and ADEM and made available to project stakeholders, including the JPA.

8.0 SELECTION CRITERIA

The selection criteria used to evaluate the six response action alternatives consist of effectiveness in reducing the public safety risks, the implementability of the alternative, and the cost of implementing the alternative.

9.0 DESCRIPTION OF SELECTED REMEDIES

The recommended response action for MRS-1 where the land use is mixed use or non-McClellan Park System is Alternative 6 – Clearance to Depth. Residual risk that may remain following the Clearance to Depth will be managed through the inclusion of a deed notice in the property transfer documents that informs future property owners of the historical military use and provides notification procedures in the event a MEC item is discovered.

The recommended response action for MRS-1 where the land use is McClellan Park System is Alternative 5 – Clearance to 1 Foot and Alternative 2 – Land Use Controls. Residual risk that may remain following the Clearance to 1 Foot will be managed through the inclusion of a deed restriction that will prohibit digging in this area without construction support. A deed restriction will also be placed that prohibits digging within the asphalt roadway without construction support provided by UXO-qualified personnel.

The recommended response action for the Proposed Industrial Access Road MRS is Alternative 6 – Clearance to Depth and Alternative 2 – Land Use Controls. Residual risk that may remain following the Clearance to Depth will be managed through the inclusion of a deed notice in the property transfer documents that informs future property owners of the historical military use and provides notification procedures in the event a MEC item is discovered. A deed restriction will also be placed that prohibits digging within the asphalt roadway without construction support provided by UXO-qualified personnel.

10.0 TRADE-OFF ANALYSIS

These response actions are the best response actions as determined from the available historical records, data gathered in support of the Army EE/CA investigations, and is compatible with the proposed land use. Mitigative measures will be implemented during the clearance actions to ensure that there is a minimal impact to any human, ecological or cultural resources.

11.0 DOCUMENTATION OF SIGNIFICANT CHANGES

If the actions outlined in this EE/CA Action Memorandum are delayed or not taken, it could affect the redevelopment of the property, delay road work and impact critical infrastructure upgrades. Response actions presented in this Action Memorandum are required to reduce/manage the risk to the future public users.

12.0 RESPONSIVENESS SUMMARY

A responsiveness summary has not been compiled because there has not been a public meeting on the Army EE/CA.

FIGURES

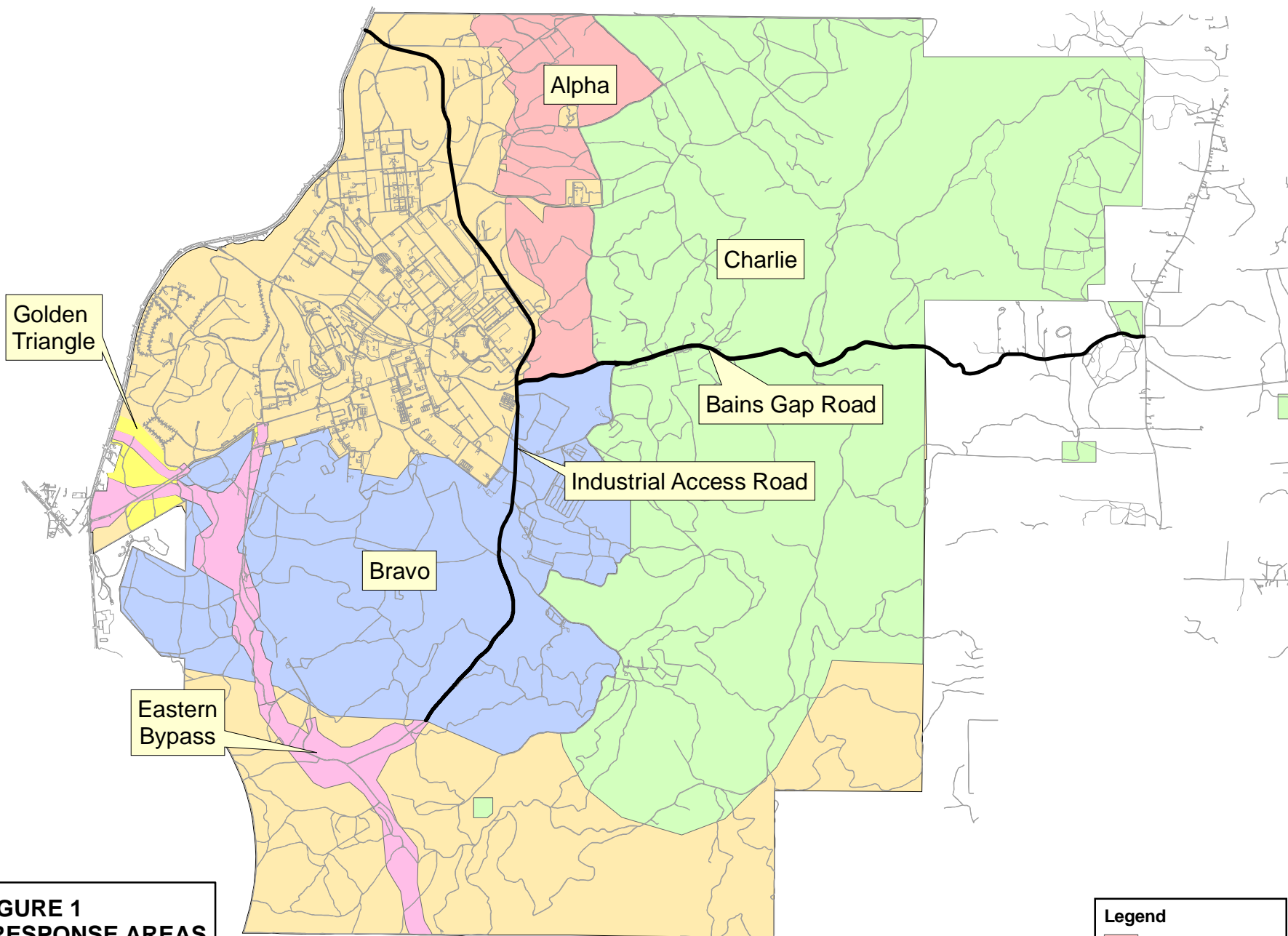


FIGURE 1
MUNITIONS RESPONSE AREAS
MCCLELLAN, AL

